

## EXHIBIT A

**From:** "Coren, Samuel (SEA)"  
**To:** [RL@LiebowitzLawFirm.com](mailto:RL@LiebowitzLawFirm.com)  
**Cc:** Hardin, John (DAL); Jennison, Judy (SEA); Rickman, Lisa (DAL); Brandon, Tracy (SEA)  
**Bcc:** Vana, James L. (SEA); Larson, Kirstin E. (SEA)  
**Subject:** Berg v. M&F Western: deposition of Mr. Berg [064984-7008]  
**Date:** Wednesday, March 4, 2020 2:12:55 PM  
**Attachments:** [image001.jpg](#)  
[Berg v. M&F Western - deposition of Mr. Berg \[064984-7008\].pdf](#)

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**Sent on behalf of Kirstin Larson:**

Dear Richard,

Please let us know Mr. Berg's earliest availability the first week of April for his deposition (to commence at 9 a.m. CST), to be held either at our Dallas offices or a the federal courthouse in Tyler. We are happy to accommodate whichever location is more convenient for Mr. Berg.

We will then revert with the completed notice.

Sincerely,

Kirstin

**Kirstin E. Larson | Perkins Coie LLP**  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

ROBERT BERG,

§

Plaintiff

§

vs.

§

Case No. 6:19-cv-418-JDK

M&F WESTERN PRODUCTS, INC.,

§

Defendant.

§

**DEFENDANT'S NOTICE OF DEPOSITION OF PLAINTIFF, ROBERT BERG**

TO: Plaintiff, ROBERT BERG, by and through his attorney of record, Richard Liebowitz, Liebowitz Law Firm, PLLC, 11 Sunrise Plaza, Suite 305, Valley Stream, New York 11580.

YOU ARE HEREBY NOTIFIED that, pursuant to Fed. R. Civ. P. 30, Defendant M&F Western Products, Inc. ("M&F Western"), by and through its undersigned attorneys, will take the deposition of Plaintiff, ROBERT BERG ("Plaintiff" and "Berg").

Such deposition will commence at 9:00 a.m. (CST) on April       , 2020, at the offices of Perkins Coie, LLP (500 N. Akard Street, Suite 3300, Dallas, Texas 75201), or at the federal courthouse in Tyler, and will continue from day-to-day until completed. Such deposition will be taken for the purposes of discovery, for use as evidence at trial, and for any other permissible purpose under the Federal Rules of Civil Procedure. The deposition will be taken before a certified court reporter or other person qualified to administer oaths and will be recorded by stenographic means and may be videotaped, and real-time transcription services may be utilized.

Dated: March 4, 2020

Respectfully submitted,

By: \_\_\_\_\_

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***Attorneys for Defendant M & F Western Products, Inc.***

**CERTIFICATE OF SERVICE**

I hereby certify that on March \_\_, 2020, I caused copies of the foregoing document to be served via CM/ECF to the counsel of record in this matter.

\_\_\_\_\_  
John R. Hardin